

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ISAAC WRIGHT, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

DRIVERDO, LLC,

Defendant.

No. 1:22-cv-4553

DECLARATION OF ADAM FRIEND

I, Adam Friend declare as follows:

1. I am the Risk Manager employed by DriverDo, LLC dba DRAIVER ("DriverDo").

Unless otherwise stated, I have personal knowledge of all the facts stated herein.

2. DriverDo is a technology company that has created multiple software programs, one of which is a mobile application that companies utilize to transport their vehicles using independent contractor drivers (“Independent Contractor Users/Independent Contractors”).

3. In order for an individual Independent Contractor User to be listed in the DriverDo driver marketplace and access Trip Transactions offered on DriverDo's mobile application, the individual must download the DriverDo mobile application and register for a User Account with DriverDo.

4. DriverDo has Terms of Service (“TOS”) which contain arbitration clauses that must be accepted by the Independent Contractor Users. All Independent Contractor Users signed TOS that include arbitration clauses, including Isaac Wright

5. In my role as Risk Manager of Driverdo, I have access to information on when Independent Contractor Users first signed the TOS.

6. Attached as Exhibit A to my Declaration is a true and correct copy of a spreadsheet outlining the name of the Independent Contractor User, date they signed the TOS with the arbitration agreement and link to an image of their signature accepting the TOS.

7. In total, DriverDo has on record 5389 Independent Contractor Users who have signed the TOS that includes the mutual arbitration agreement between August 26, 2019 and May 16, 2023.

8. Further, prior to any Independent Contractor User performing a trip transaction, they must agree again prior to any trip transaction with the TOS which contains the arbitration clause.

9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true.

FURTHER DECLARANT SAYETH NAUGHT



ADAM FRIEND

Executed this 26th day of May, 2023, in Overland Park, Kansas.